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Document Number:

7) IV-E-2

Docket Number:

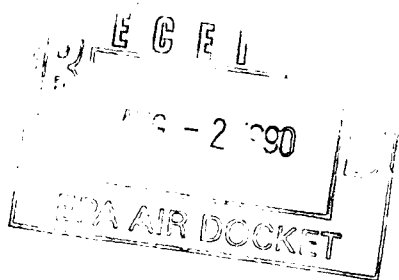
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: July 17, 1990 Meeting with Ford Motor Company
Concerning Ethyl Corp Waiver Application

FROM: David J. Kortum, Environmental Engineer
Field Operations and Support Division

TO: Docket A-90-16

David J. Kortum
7/31/90

On July 17, 1990, Mary Smith, Jim Caldwell, John Holley, Nancy Ketcham-Colwill, Michael Winer, John Hannon, and Dave Kortum, all of EPA met with Dewain Belote, Dave Kulp, and Nancy Homeister of the Ford Motor Company to discuss the Ethyl fuel waiver application to allow HiTEC 3000 (or MMT) up to 1/32 gram per gallon manganese in unleaded gasoline.

Mr. Kulp presented some of Ford's concerns regarding data presented in the application and, in general, the use of MMT. These include: 1) The use by Ethyl in their test program of high quality test fuels without typical in-use additives may have caused atypical emission changes. 2) Ford data on the analysis of Canadian catalysts indicates that plugging of catalysts may occur as a result of MMT use, especially for certain high-temperature driving cycles. 3) The Ethyl data should track Ford certification data, but it does not. 4) Certain maintenance procedures performed by Ethyl, such as the replacement of fuel injectors, may have resulted in unrepresentative emissions.